### BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the Matter of:

Use of N11 Codes and Other Abbreviated Dialing Arrangements. CC Docket No. 92-105 (DA 07-2017)

# COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES COMMISSION AND THE PEOPLE OF THE STATE OF CALIFORNIA

The California Public Utilities Commission and the People of the State of California (CPUC or California) submit this filing in response to the Public Notice the FCC issued on May 7, 2007 seeking public comment on the status of the usage of 211 and 511 abbreviated dialing codes. Specifically, the FCC wants to know whether 211 and 511 have been implemented in a manner consistent with the FCC's assignment of these two abbreviated dialing codes. The short answer for California is that both 211 and 511 dialing patterns have been implemented, and both are being used as the FCC intended.

#### I. 211

In CPUC Decision 03-02-029, the CPUC adopted the regulatory policies and procedures needed to implement 211 service in California.

Specifically, D.03-02-029 established guidelines and procedures whereby the CPUC can certify information and referral (I&R) providers as eligible to purchase network telephone service to enable them to receive calls dialed to 211. In particular, and consistent with FCC rules, the CPUC required payphone operators in California to discontinue any incompatible use of 211 dialing, and to route such calls to I&R providers in those areas or counties where 211 has been implemented.

The CPUC decision also created a process for I&R providers to obtain necessary approval from the CPUC. Finally, D.03-02-029 provided that if a particular I&R provider failed to introduce 211 service within a year of receiving CPUC authority, that I&R provider would have its CPUC authority rescinded.

After issuance of D.03-02-029, implementation of 211 service has proceeded at a steady but modest pace, with I&R providers in counties in the major metropolitan areas in both northern and southern California by now having sought and received approval to provide 211 service. The CPUC continues to receive applications for implementation of 211 service in the remaining unserved areas of the state.

A list of the regions in California where 211 service has been deployed is appended to this filing as Attachment 1.

#### II. 511

The CPUC's role in the deployment of the 511 dialing pattern has been minimal. The FCC's order that designated the traffic information purpose for 511 did not include a formal role for state commissions, and the CPUC has not attempted to involve itself in deployment of 511 service. Shortly after the FCC order became effective, CPUC staff did hold a meeting with carriers to address their questions about what, if any, role the CPUC envisioned in the set-up of 511 service. The CPUC, relying on the FCC order, has not taken action other than to provide advice on an occasional basis when such advice is sought. But otherwise, the CPUC has not participated in the implementation of 511.

The CPUC can report, however, that 511 is in use as a traffic information number in both northern and southern California. The lead agencies in California responsible for deploying 511 service are the regional transportation authorities. Because we have not been directly involved in its deployment, we cannot report on exact areas where 511 traffic information service is available. But most certainly, it is

available in the San Francisco Bay Area, the greater Los Angeles metropolitan area, as well as in and around Sacramento.

The CPUC is unaware of any continuing use of 511 for any purpose other than to provide traffic information. Use of 511 traffic information service has proven to be an extremely valuable tool for our metropolitan transportation commissions throughout the state in responding to and easing traffic congestion. Given the level of public and governmental interest in furthering the deployment of 511, the CPUC expects that any carrier failure to participate in 511 implementation would be reported to this agency. Given the lack of complaints, the CPUC is satisfied that 511 traffic information service is being deployed in California consistent with the FCC's orders and expectations.

#### III. CONCLUSION

The CPUC can confidently report that both 211 and 511 service are being implemented in California as the FCC envisioned. We are unaware of any unauthorized or inappropriate use of either the 211 or 511 abbreviated dialing codes. Further, we have had a positive experience in responding promptly to I&R requests to provide 211 service. As noted above, because we have no direct involvement in the deployment of 511, our experience has been more removed. But again,

we would expect that any significant problems would be reported to the CPUC.

Respectfully submitted,

RANDOLPH WU HELEN M. MICKIEWICZ

By: /s/ HELEN M. MICKIEWICZ

Helen M. Mickiewicz

505 Van Ness Avenue San Francisco, CA 94102 Phone: (415) 703-1319 Fax: (415) 703-4592

Attorneys for the California Public Utilities Commission and the People of the State of California

May 30, 2007

## ATTACHMENT 1

#### REGIONS IN CALIFORNIA WITH 211 SERVICE

InfoLine of LA (Los Angeles County), October 16, 2003.

- EDEN & R, Inc. (Alameda County, December 4, 2003.
- Contra Costa Crisis Center (Contra Costa County), February 26, 2004.
- Info Link Orange County, April 1, 2004.
- Help Link (San Francisco County), May 27, 2004.
- Interface Helpline (Ventura County), May 27, 2004.
- Volunteer Center of Riverside County, August 19, 2004.
- INFO LINE of San Diego County, August 19, 2004.
- Family Services of Santa Barbara (Santa Barbara County), December 2, 2004.
- Community Services Planning Council Inc. (Sacramento County), March 15, 2005
- Inland Empire United Way (San Bernardino County), February 16, 2006
- HELPLINK, United Way Community Information Center (Marin County)
  April 13, 2006
- United Way of Stanislaus Area approved July 20, 2006
- United Way Silicon Valley (Santa Clara County) September 7, 2006
- The Community Action Partnership (Kern County) January, 2007
- HELPLINK- United Way Community Information Center (Solano County)

  March 15, 2007
- HELPLINK- United Way Community Information Center (Napa County)
   March 15, 2007.
- Hotline of San Luis Obispo County (San Luis Obispo County) filed
  - May 16, 2007 pending approval